SURTEK RoHS Policy

SURTEK is committed to supplying products that conform to the European Union (EU) Directive 2015/863 amendment of the RoHS Directive 2011/65/EU: Restriction of Hazardous Substances (RoHS).

According to the RoHS Directive 2015/863 amendment, additional last 4 substances in the list below should be phasing out of many electronic components by July 22nd, 2019:

- Lead(Pb):0.1%
- Hexavalent chromium(CrVI):0.1%
- Mercury(Hg):0.1%
- Cadmium(Cd):0.01%
- Polybrominated biphenyls (PBBs):0.1%
- Polybrominated diphenyl ethers (PBDEs):0.1%
- Bis(2-Ethylhexyl) phthalate (DEHP):0.1% (Added in 2015)
- Benzyl butyl phthalate (BBP): 0.1% (Added in 2015)
- Dibutyl phthalate (DBP): 0.1% (Added in 2015)
- Diisobutyl phthalate (DIBP): 0.1% (Added in 2015)

We have undertaken wide ranging research into these substances and their use. The key substance that affects our product range is lead. Selection and testing of alternative materials has been undertaken and certain levels of formal qualifications have been completed within our facilities. We can provide comprehensive and in-depth guidance to customers on appropriate technologies and alternative components that are in compliance with RoHS standards.

In line with the directive we are currently supplying fully certified RoHS compliant products to our customers as standard. However, we are aware that many of our customer's products are exempt from the RoHS requirements and are therefore committed to continuing to supply existing products and services without change. Should change be unavoidable through component supply constraints, we will work with our customers to ensure that they are notified in advance of any changes that are required to allow continuity of supply.

SURTEK REACH Policy

SURTEK is fully aware of the European Union (EU) Registration, Evaluation and Authorization [and restriction] of Chemicals (REACH) Regulation, EC number 1907/2006, that entered into force on 1st June 2007.

The REACH Regulation has been adopted throughout the EU to improve the protection of human health and the environment from the risks that can be posed by chemicals. It also promotes alternative methods for the hazard assessment of substances in order to reduce the number of tests on animals.

SURTEK is also aware of the expansion of the REACH Substances of Very High Concern (SVHC) list to 155 substances as of June 2014.

SURTEK 's products are "articles" as defined in Article 3(3) of the REACH Regulation ("*an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition*") and do not release substances under their normal use.

Suppliers of articles must provide recipients with information on SVHC if those are present above a concentration limit of 0.1% on an article level. SURTEK's products do not contain any of the currently listed SVHC's above this concentration limit.

This said, we are continually reviewing our obligations with regard to this regulation based on available information and we are continuing to work with our suppliers to ensure that all SVHC's are notified to the European Chemicals Agency, if necessary, to comply with the REACH requirement.

SURTEK Conflict Minerals Policy

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act, which includes section 1502, a section which regulates disclosure of the use of any "Conflict Minerals". Conflict Minerals refers to minerals and other derivatives mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries, where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. The four minerals covered by the act are Gold (Au), Tantalum (Ta), Tin (Sn) and Tungsten (W) – collectively known as 3TG, all of which can be used in electronic components such as frequency control products.

SURTEK is committed to having a socially responsible supply chain and will not condone any abuse of human rights; but the supply chain of these minerals is long and complex. Tracing the ownership and origin of these minerals is challenging as the supply chain includes multiple actors, from small-scale producers to local consolidators as well as smelters and other processors. The smelting and refining of minerals often combines ore from many different sources, making it difficult to trace their origin after refining.

Smelters have been identified as the pinch-point in these supply chains and SURTEK support the development of the Conflict-Free Smelter (CFS) program developed by the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI). The CFS is a voluntary program that aims to enable responsible mineral sourcing through evaluating the source and conflict-free status of minerals that are processed by smelters.

However SURTEK do not purchase any of the Conflict Minerals directly from smelters, so we have taken measures to eliminate Conflict Minerals from our products by working with our suppliers to gain assurances that none of the 3TG minerals used in our products are derived the DRC Conflict Region. We have further requested our suppliers refuse to use Conflict Minerals from this region in all present and future materials, while also notifying their upstream suppliers of this requirement. Therefore based upon the information provided by our suppliers SURTEK's components do not knowingly contain minerals derived from the DRC Conflict Region.